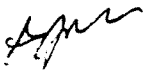


MEMORANDUM

State of Alaska

TO: David DiTraglia
Manager
Hazardous Waste Program

FROM: Glenn Miller 
Environmental Engineer III

DATE: July 29, 1987

FILE NO: C8A

TELEPHONE NO: 465-2666

SUBJECT: RCRA Compliance
Training Exercise
Northern Oilfield Services/
Atwood, Inc.

On September 11, 1986, field officer Jeff Mach inspected Northern Oilfield Services/Atwood, Inc. for compliance with RCRA. The inspection report is enclosed. The only potential violation noted was a failure to keep a copy of a manifest for the required three-year period. On June 18, 1987 I called the Anchorage office of the firm and offered them an opportunity to prove that they had saved a copy of the manifest in the Anchorage office. I found that Atwood and Northern Oilfield Services had been acquired by the Veco Construction Company. No manifest copy was found at the office. The proper response to the violation would be a notice of violation, however, since the companies have changed hands, I recommend no enforcement action.

GM1/clb
Attachment - Inspection report

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DIVISION OF ENVIRONMENTAL QUALITY
P.O. BOX 0, JUNEAU, ALASKA 99811-1800

Telephone:
(907)465-2666

July 31, 1987


Mr. Steve Torok
U.S. EPA
Alaska Operations Office
3200 Hospital Drive
Juneau, AK 99801

Dear Mr. Torok:

Attached with this letter is the RCRA compliance inspection for Northern Oilfield Services and Atwood Inc.

Please contact me or Glenn Miller at 465-2666 if you have any questions about the inspection.

Sincerely,



David DiTraglia, Manager
Hazardous Waste Program

DDT/GM1/clb

Enclosure: Inspection Report
Checklist
Enforcement Considerations

cc: File C8A
Jeff Mach

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**Alaska Department of Environmental Conservation
RCRA Hazardous Waste Management Compliance Evaluation Inspection Report**

Facility Name: Atwood, Inc. / Northern Oilfield Services

Identification Number: AKD 980976799 / AKD 023254378

<u>Mailing Address:</u> Deadhorse: Pouch 340043 Prudhoe Bay, AK 99734	Anchorage: P.O. Box 4-584 Anchorage, AK 99509
--	---

Facility Location: Tracts 2 and 3, Deadhorse Surface-Use Lease Tract Area,
Prudhoe Bay, Alaska

Telephone Number: Deadhorse: (907) 659-2876 Anchorage: (907) 562-2168

Date of Inspection: September 11, 1986

Inspector's Name/Title: Jeff Mach, Environmental Field Officer
Alaska Department of Environmental Conservation
Northern Regional Office
Pouch 1601
Fairbanks, Alaska 99707-1601
Telephone: (907) 452-1714

Background and Compliance History:

Atwood Inc. operates Dalton Camp, a hotel, office, and shop complex located in the Deadhorse area of Prudhoe Bay. This complex is occupied by employees of Atwood Inc. and affiliated companies, such as Northern Oilfield Services, and other nonaffiliated oilfield service companies that lease residence, office, and work space. Northern Oilfield Services provides a variety of miscellaneous services, such as earthwork and snow road construction, welding, and vacuum truck services to North Slope, oil industry-related businesses.

Because of the similarities in their hazardous waste activity notification forms and the fact that the companies share the same facility, the inspections were conducted as one and this report serves for both. The company was advised that they could probably vacate one of the identification numbers and simplify the situation.

There is no previous hazardous waste compliance history with either of these companies at this facility or elsewhere.

Introduction and Record Review:

Atwood Inc. and Northern Oilfield Services notified EPA of hazardous waste generation and transportation activity at the same time, in December 1984, with virtually identical forms. The companies both identified the handling of listed spent halogenated and nonhalogenated solvents (F001, F002, F003, F004, and F005), listed petroleum refining wastes (K048, K049, K050, K051, and K052), and ignitable (D001), corrosive (D002), reactive (D003), and EP toxic (D004 - D017) characteristic hazardous wastes.

Beyond the EPA hazardous waste activity notification forms, the only hazardous waste records in the DEC files on these companies consisted of one manifest that showed Northern Oilfield Services serving as the transporter for a shipment of waste oil from Conoco - Milne Point Unit to the ARCO Prudhoe Bay Unit injection facility in August 1985.

Facility Inspection:

Jeff Mach began the inspection at 9:00 am, with an interview of Mr. John Anchor, Camp Manager. Mr. Anchor advised that he served as a representative of both companies, because they are commonly owned and closely associated. The hazardous waste activities of both companies were reviewed and a tour of the facility was made.

Mr. Anchor reported that the facility generates the following potential hazardous wastes: used lubricating oil and solvent from vehicle and equipment maintenance and paint or lacquer thinners from periodic painting operations. Stoddard solvent is used in the facility's shop for equipment maintenance work. Used solvent from a parts cleaning dip tank of approximately 30 gallons in size is generated periodically, with the frequency depending on the level of work. The used oil, solvent, and paint and lacquer thinners are mixed and burned as used oil fuel in a Kroll 380,000 Btu/hr space heater, located in the shop building.

A tour of the Dalton Camp facility with Mr. Anchor revealed no accumulations of materials in containers, tanks, or elsewhere that may have been hazardous wastes.

A copy of the one known hazardous waste manifest where Northern Oilfield Services served as a transporter for a shipment of hazardous waste was not on file at the Prudhoe Bay facility. Mr. Anchor appeared to be unfamiliar with the manifest recordkeeping requirements in §263, but thought that any manifests would be kept on file in the Atwood/Northern Oilfield Services headquarters office in Anchorage. Otherwise, based on the one manifest, the company appeared to comply with the manifest requirements.

Sample Collection:

No samples were collected.

Conclusions:

No violations of the Generator or the Transporter Standards were discovered during this inspection. As with other facilities, the Atwood / Northern Oilfield Services' Dalton Camp needs to become better acquainted with the RCRA hazardous waste management requirements, since the facility generates some hazardous wastes and has served as a hazardous waste transporter.

Based on Jeff Mach's discussion with Mr. Anchor, along with observations of waste generation activities, the Dalton Camp facility appears to be a conditionally exempt small quantity generator of hazardous waste. The hazardous wastes generated by the facility appear to be spent, nonlisted solvent and paint and lacquer thinners, both of which are regulated as ignitable hazardous wastes. The disposal of these hazardous wastes at the facility by blending and burning them with used oil for energy recovery appears to be in compliance with the requirements of §266, Subpart E.

Northern Oilfield Services' failure to have a copy of the one known hazardous waste manifest on file at Dalton Camp is not necessarily a violation of §263.22(a), since the transporters' requirement does not preclude such recordkeeping in Anchorage. Whether a copy of the manifest was on file in the Anchorage office, could not be confirmed during this inspection. A 3007 letter requesting a copy of this manifest or a visit to the Anchorage office to review their records could confirm their compliance with the transporter recordkeeping requirements.

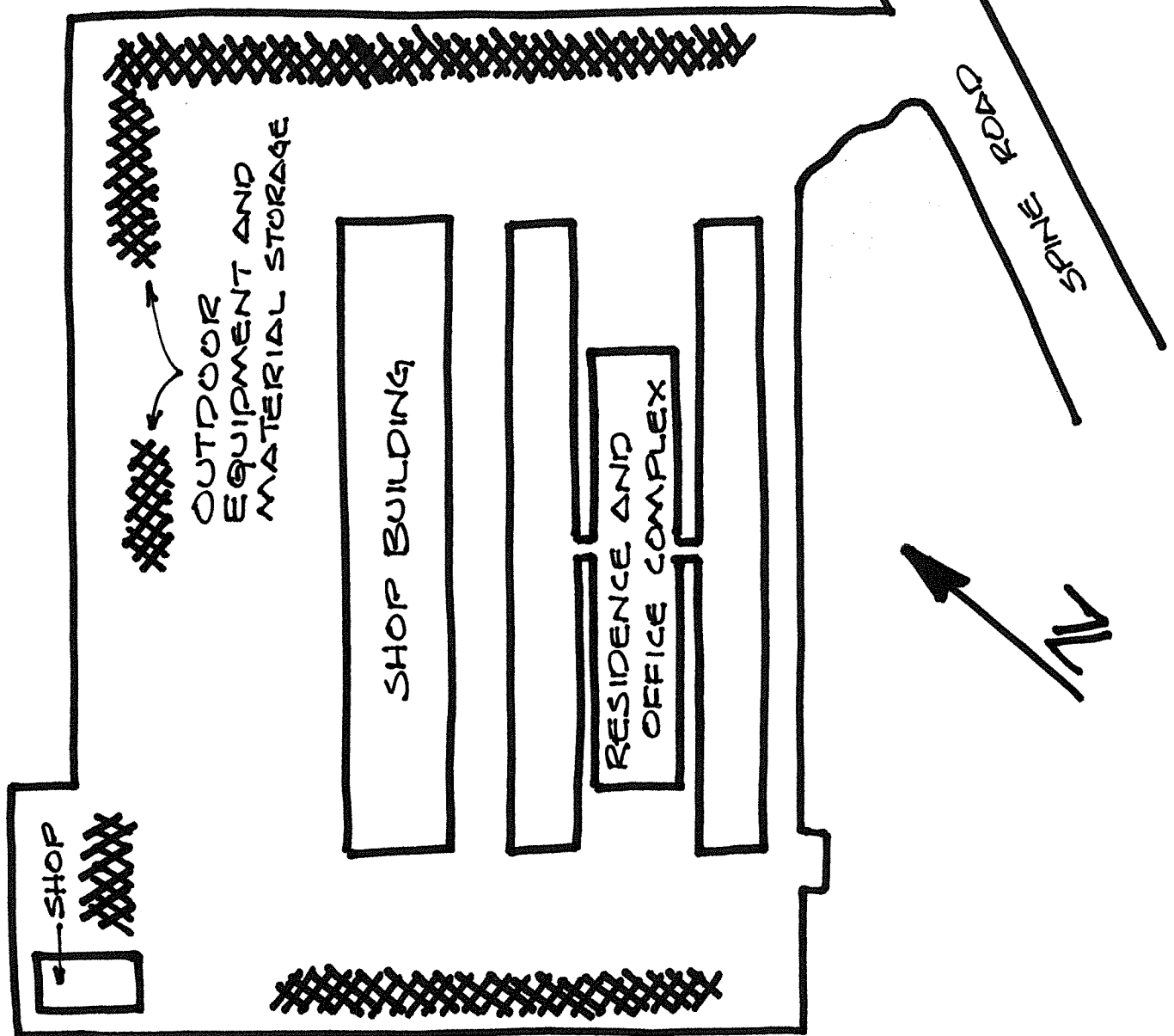
Appendices:

1. Facility Diagram
2. Copy of Manifest
3. RCRA Inspection Checklist

Closing Discussion With Facility:

Jeff Mach held a closing discussion with Mr. Anchor. Since both Atwood Inc. and Northern Oilfield Services operate out of the same facility, Mach recommended that they consider requesting EPA to rescind one of the identification numbers, such as the Atwood Inc. number, and operate solely as Northern Oilfield Services. Mr. Anchor was advised that the facility needed to monitor its generation of potential hazardous wastes, by watching product purchases, changes in operations, and by conducting some waste analyses. Mr. Anchor was also advised to watch for changes in the regulation of used oil in the future. In relation to the transportation of hazardous wastes by Northern Oilfield Services, Mr. Anchor was advised to review the recordkeeping requirements in §263 and ensure that the company

complied with them.



NOT TO SCALE

ATWOOD INC / NORTHERN
OILFIELD SERVICES
"DALTON CAMP"
TRACTS 2 AND 3, DEADHORSE

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

1.K.D.9.8.0.9.7.7.6.8.0

0045

3. Generator's Name and Mailing Address

APP 9 1986

CONSCO INC

POUCH 340045

PRUDHOE BAY, AK, 99734

A. State Manifest Document Number

B. State Generator's ID

4. Generator's Phone (907) 659-2763

5. Transporter 1 Company Name

6.

US EPA ID Number

C. State Transporter's ID

NORTHERN OILFIELD SERVICES I.A.K.D.0.2.3.2.5.4.3.7.8

D. Transporter's Phone

7. Transporter 2 Company Name

8.

US EPA ID Number

E. State Transporter's ID

9. Designated Facility Name and Site Address

10.

US EPA ID Number

G. State Facility's ID

ARCO Injection Facility

PRUDHOE BAY, AK.

I.A.K.D.9.9.1.2.8.1.2.2.1

H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total Quantity

14. Unit Wt/Vol

15. Waste No.

a. WASTE OIL - FLAMMABLE LIQUID - ID: UN1270

No. 1

Type T.T.

1596

~~1596~~ 6

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

NONE

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name

GARREL ROWELL

Signature

Garrel Rowell

Date

Month Day Year

8/1/85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

MIKE SEVERANCE

Signature

Mike Severance

Month Day Year

8/1/85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

Received 39 BBL's

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

G-CLASS/29

Printed/Typed Name

C.J. MITCHELL

Date

Month Day Year

10/8/85

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised March 8, 1983)

- A. Inspection: Type of Inspection: Evaluation (☒); Sampling ();
Record Review (); Special (); Follow-up;
Date/Time Inspection commenced: SEPTEMBER 11, 1986 9AM.

B. Facility

EPA/State ID AKD 980976799 / AKD 023254378
Name & Addresses ATWOOD INC. / NORTHERN OILFIELD SERVICES
 1. Mailing: PO BOX 4-584, ANCHORAGE, AK. 99509
 2. Location: PO BOX 340043
TRACTS 2 & 3
PRUDHOE BAY, AK. 99734
Contact: MR. LARRY PETERSON, SENIOR V.P.
Telephone: (907) 562-2168

C. <u>Compliance Summary</u>	<u>IN</u>	<u>OUT</u>	<u>N/A</u>
RCRA (Statute)	()	()	(<input checked="" type="checkbox"/>)
40 CFR 270	()	()	(<input checked="" type="checkbox"/>)
40 CFR 124	()	()	(<input checked="" type="checkbox"/>)
40 CFR 261.5	(<input checked="" type="checkbox"/>)	()	()
40 CFR 262	()	()	(<input checked="" type="checkbox"/>)
40 CFR 263	(<input checked="" type="checkbox"/>)	()	()
40 CFR 264 (Permit)	()	()	(<input checked="" type="checkbox"/>)
40 CFR 265	()	()	(<input checked="" type="checkbox"/>)

Specific Violations: _____

D. Inspector

Name (Print) JEFF MACH Title: ENVIRONMENTAL
Signature [Signature] FIELD OFFICER
Organization AK. DEPT. OF ENVIRONMENTAL CONSERVATION
Phone (907) 452-1714

E. Inspection Participants:

Name	Title	Phone #
<u>MR. JOHN ANCHOR</u>	<u>CAMP MGR</u>	<u>(907) 659-2867</u>

F. Notification/Permit Information

1. Started operation: CA. 1978 Date:
2. Notification filed: ☒ YES ☐ NO Date: 12/84
3. Part A application filed: YES ☒ NO Date:
4. Part B called/Date Due YES ☒ NO Date:
5. Part B application: YES ☒ NO Date:
6. Changes in Notification or Part A:

7. Facility's classified as:

Generator	<input checked="" type="radio"/>
Transporter	<input checked="" type="radio"/>
Treatment facility	<input type="radio"/>
Storage facility	<input type="radio"/>
Disposal facility	<input type="radio"/>
Small quantity generator	<input type="radio"/>
Recycler	<input type="radio"/>
Less than 90 day storage	<input type="radio"/>
Wastewater treatment unit exemption (WWTU)	<input type="radio"/>
Elementary neutralization unit exemption (ENU)	<input type="radio"/>

8. Does facility have a Part A withdrawal request in ?
YES ☒ NO

Status

Comments: BOTH COMPANIES NOTIFIED OF GENERATION
AND TRANSPORTATION ACTIVITIES; BOTH
OPERATE FROM SAME FACILITY.

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

- (1) Ignitability D001 (SMALL QUANTITIES OF SOLVENT, PAINT THINNERS)
- (2) Corrosivity D002 (NOTIFIED - NO APPARENT GENERATION)
- (3) Reactivity D003 (NOTIFIED - NO APPARENT GENERATION)
- (4) EP Toxicity (NOTIFIED - NO APPARENT GENERATION)

b. Listed HW?

- (1) HW from non-specific sources (FXXX)
F001 - F005 (NOTIFIED - NO APPARENT GENERATION)
- (2) HW from specific sources (KXXX)
K048 - K052 (NOTIFIED - NO APPARENT GENERATION)

c. Discarded commercial chemical product (PXXX or UXXX)

- (1) PXXX _____
- (2) UXXX _____

d. Has facility petitioned to delist waste? YES ☒ NO

Date: _____ Comments: _____

e. Does facility qualify for WWTU or ENU? YES ☒ NO

Comments: _____

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? SEE REPORT

- (1) What are the wastes generated? _____
- (2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? KNOWLEDGE OF PRODUCTS USED

Comments: _____

(3) Are records available on the determination(s)? YES ☒ NO

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES

NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

SEE REPORT.

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste:
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised March 8, 1984)

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]? YES ☒ NO
- a. If yes, is the waste stored in containers or tanks?
- b. Is any HW stored in waste piles or surface impoundments? YES ☒ NO

B. Small Quantity Generator (SQG) Regulations

1. Has generator determined if he generates a hazardous waste (262.11). ☒ YES NO
2. Which of the following describes the SQG's treatment and/or disposal of his HW?
- a. occurs on-site ☒ YES NO
MIXED WITH USED OIL AND BURNED FOR ENERGY RECOVERY
- b. ensure delivery to an off-site facility, either of which is:
- (1) permitted under Part 270 YES ☒ NO
- (2) in interim status under Part 270 and 265 YES ☒ NO
- (3) authorized to manage HW by an authorized state YES ☒ NO
- (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES ☒ NO
- (5) (a) facility which
- (a) beneficially uses, re-uses recycles or reclaims his HW YES ☒ NO
- (b) treats his waste prior to use, re-use, recycle, or reclamation YES ☒ NO
3. Does generator manifest his wastes (not required)? YES ☒ NO

III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)

N/A

- A. Is the facility or does facility claim to be a small quantity generator?

YES NO

Comments: APPEARS TO BE CONDITIONALLY EXEMPT AT THIS TIME

- B. Does generator transport its own waste?

YES NO

1. If NO, what is contractor's EPA ID, name, address, and phone?

2. If YES, see Transporter Regulations (Section III).

- C. Does generator use the manifest system?

YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES NO

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

- a. Manifest document number

YES NO

- b. Generator's name, mailing address, phone number, and EPA ID number

YES NO

- c. Name and ID number of each transporter

YES NO

- d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any.

YES NO

- e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203.

YES NO

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

A. Transporter facility description.

1. Operates as a Transfer Facility YES ☒ NO
2. Operates as a Storage Facility YES ☒ NO
3. Operates as a Generator ☒ YES NO
4. Imports Wastes YES ☒ NO
5. Combines Manifested Shipments YES ☒ NO

B. Does transporter have an EPA ID? ☒ YES NO

C. Does the transporter comply with generator regulations under Part 262 if he imports hazardous waste or combines wastes of different DOT shipping descriptions into a single container? YES NO ☒ N/A

D. Does the transporter comply with storage regulations under Parts 270, 264, and 265 if he stores manifested shipments at a transfer facility for more than 10 days? YES NO ☒ N/A

E. Is transporter aware of and complying with manifest requirements under RCRA 263.20?

1. Before transporting HW is manifest dated and signed by generator? ☒ YES NO

2. Does the transporter sign, date, and return a copy of the manifest to the generator before transporting waste off the generator's property? ☒ YES NO

3. Does the transporter delivering hazardous waste to another transporter or the designated facility:

a. Obtain a signed and dated (S/D) copy of the manifest? ☒ YES NO

b. Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date?

UNKNOWN; COPY
NOT AT PRUGHOE
YES NO BUT MAY
BE IN
ANCHOR-
AGE

c. Give remaining copies of the manifest to accepting transporter or designated facility? ☒ YES NO

4. Does transporter deliver the entire quantity of HW accepted to:
- a. The designated facility listed on the manifest? or ☒ YES NO
 - b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO
 - c. The next designated transporter? YES NO
5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO
- F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? ☒ YES NO
- 1. Give notice to generator ☒ YES NO
 - 2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15?
 - 3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. ☒ YES NO
 - 4. Comments ☒ YES NO

**Alaska Department of Environmental Conservation
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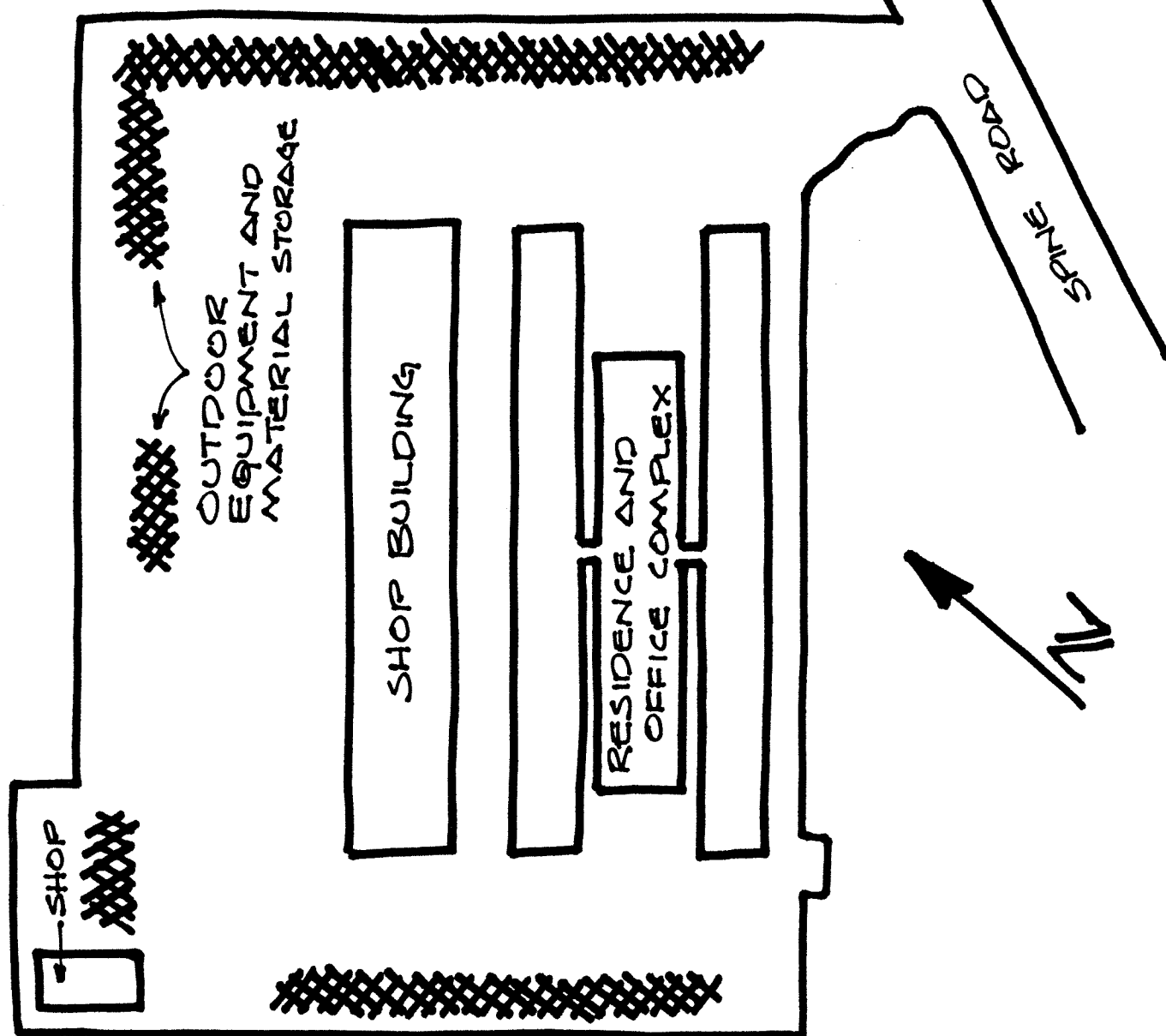
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OILFIELD SERVICES
"DALTON CAMP"
TRACTS 2 AND 3, DEADHORSE

UNIFORM HAZARDOUS
WASTE MANIFEST

AK.D.9.8.0.9.7.7.6.8.0

Document

of

is not required by Federal
law.

3. Generator's Name and Mailing Address

APP 91982

CONOCO INC

POUCH 340045

Prudhoe Bay, AK, 99734

A. State Manifest Document Number

B. State Generator's ID

4. Generator's Phone (907.) 659-2763

5. Transporter 1 Company Name

6. US EPA ID Number

NORTHERN OILFIELD SERVICES AK.D.0.2.3.2.5.4.3.7.8

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

10. US EPA ID Number

ARCO Injection Facility

Prudhoe Bay, AK.

AK.D.9.9.1.2.8.1.2.2.1

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total Quantity

14. Unit Wt/Vol

1. Waste No.

a. WASTE OIL - FLAMMABLE LIQUID - ID: UN1270

No.

Type

1596

G

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

NONE

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name

GARREL ROWELL

Signature

Garrel Rowell

Date

Month Day Year

8/1/85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

MIKE SEVERANCE

Signature

Mike Severance

Month Day Year

8/1/85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

Received 39 BBL's

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

C. J. MITCHELL

Date

Month Day Year

10/5/85

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised March 8, 1983)

A. Inspection: Type of Inspection: Evaluation (✓); Sampling ();
Record Review (); Special (); Follow-up;
Date/Time Inspection commenced: SEPTEMBER 11, 1986 9 AM.

B. Facility
EPA/State ID AKD 980976799 / AKD 023254378
Name & Addresses ATWOOD INC. / NORTHERN OILFIELD SERVICES
1. Mailing: P.O. BOX 4-584 ANCHORAGE, AK. 99509
2. Location: P.O. BOX 340043
TRACTS 2 & 3
PRUDHOE BAY, AK. 99734
Contact: MR. LARRY PETERSON, SENIOR V.P.
Telephone: (907) 562-2168

<u>C. Compliance Summary</u>	<u>IN</u>	<u>OUT</u>	<u>N/A</u>
RCRA (Statute)	()	()	(✓)
40 CFR 270	()	()	(✓)
40 CFR 124	()	()	(✓)
40 CFR 261.5	(✓)	()	()
40 CFR 262	()	()	(✓)
40 CFR 263	(✓)	()	()
40 CFR 264 (Permit)	()	()	(✓)
40 CFR 265	()	()	(✓)

Specific Violations: _____

D. Inspector

Name (Print) JEFF MACH Title: ENVIRONMENTAL
Signature [Signature] FIELD OFFICER
Organization AK. DEPT. OF ENVIRONMENTAL CONSERVATION
Phone (907) 452-1714

E. Inspection Participants:

Name	Title	Phone #
<u>MR. JOHN ANCHOR</u>	<u>CAMP MGR</u>	<u>(907) 659-2867</u>

F. Notification/Permit Information

1. Started operation: CA. 1978 Date: _____
2. Notification filed: ☒ YES NO Date: 12/84
3. Part A application filed: YES ☒ NO Date: _____
4. Part B called/Date Due YES ☒ NO Date: _____
5. Part B application: YES ☒ NO Date: _____
6. Changes in Notification or Part A: _____

7. Facility's classified as:

Generator	<input checked="" type="radio"/>
Transporter	<input checked="" type="radio"/>
Treatment facility	<input type="radio"/>
Storage facility	<input type="radio"/>
Disposal facility	<input type="radio"/>
Small quantity generator	<input type="radio"/>
Recycler	<input type="radio"/>
Less than 90 day storage	<input type="radio"/>
Wastewater treatment unit exemption (WWTU)	<input type="radio"/>
Elementary neutralization unit exemption (ENU)	<input type="radio"/>

8. Does facility have a Part A withdrawal request in ?
YES ☒ NO

Status _____

Comments: BOTH COMPANIES NOTIFIED OF GENERATION
AND TRANSPORTATION ACTIVITIES; BOTH
OPERATE FROM SAME FACILITY.

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

- (1) Ignitability D001 (SMALL QUANTITIES OF STANDARD SOLVENT, PAINT THINNERS)
- (2) Corrosivity D002 (NOTIFIED - NO APPARENT GENERATION)
- (3) Reactivity D003 (NOTIFIED - NO APPARENT GENERATION)
- (4) EP Toxicity (NOTIFIED - NO APPARENT GENERATION)

b. Listed HW?

- (1) HW from non-specific sources (FXXX)
F001 - F005 (NOTIFIED - NO APPARENT GENERATION)
- (2) HW from specific sources (KXXX)
K048 - K052 (NOTIFIED - NO APPARENT GENERATION)

c. Discarded commercial chemical product (PXXX or UXXX)

- (1) PXXX _____
- (2) UXXX _____

d. Has facility petitioned to delist waste? YES ☒ NO

Date: _____ Comments: _____

e. Does facility qualify for WWTU or ENU? YES ☒ NO

Comments: _____

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? SEE REPORT

- (1) What are the wastes generated? _____
- (2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? KNOWLEDGE OF PRODUCTS USED

Comments: _____

(3) Are records available on the determination(s)? YES ☒ NO

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES

NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

SEE REPORT.

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste:
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised March 8, 1984)

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]? YES ☒ NO

a. If yes, is the waste stored in containers or tanks?

- b. Is any HW stored in waste piles or surface impoundments? YES ☒ NO

B. Small Quantity Generator (SQG) Regulations

1. Has generator determined if he generates a hazardous waste (262.11). ☒ YES NO

2. Which of the following describes the SQG's treatment and/or disposal of his HW?

- a. occurs on-site ☒ YES NO
MIXED WITH USED OIL AND BURNED FOR ENERGY RECOVERY
- b. ensure delivery to an off-site facility, either of which is:

(1) permitted under Part 270 YES ☒ NO

(2) in interim status under Part 270 and 265 YES ☒ NO

(3) authorized to manage HW by an authorized state YES ☒ NO

(4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES ☒ NO

(5) (a) facility which

(a) beneficially uses, re-uses recycles or reclaims his HW YES ☒ NO

(b) treats his waste prior to use, re-use, recycle, or reclamation YES ☒ NO

3. Does generator manifest his wastes (not required)? YES ☒ NO

III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)

N/A

- A. Is the facility or does facility claim to be a small quantity generator?

YES NO

Comments: APPEARS TO BE CONDITIONALLY EXEMPT
AT THIS TIME

- B. Does generator transport its own waste?

YES NO

1. If NO, what is contractor's EPA ID, name, address, and phone?
2. If YES, see Transporter Regulations (Section III).

- C. Does generator use the manifest system?

YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES NO

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.
3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

- | | |
|---|--------|
| a. Manifest document number | YES NO |
| b. Generator's name, mailing address, phone number, and EPA ID number | YES NO |
| c. Name and ID number of each transporter | YES NO |
| d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any. | YES NO |
| e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. | YES NO |

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

A. Transporter facility description.

1. Operates as a Transfer Facility YES ☒ NO
2. Operates as a Storage Facility YES ☒ NO
3. Operates as a Generator ☒ YES NO
4. Imports Wastes YES ☒ NO
5. Combines Manifested Shipments YES ☒ NO

B. Does transporter have an EPA ID? ☒ YES NO

C. Does the transporter comply with generator regulations under Part 262 if he imports hazardous waste or combines wastes of different DOT shipping descriptions into a single container? YES NO ☒ N/A

D. Does the transporter comply with storage regulations under Parts 270, 264, and 265 if he stores manifested shipments at a transfer facility for more than 10 days? YES NO ☒ N/A

E. Is transporter aware of and complying with manifest requirements under RCRA 263.20?

1. Before transporting HW is manifest dated and signed by generator? ☒ YES NO

2. Does the transporter sign, date, and return a copy of the manifest to the generator before transporting waste off the generator's property? ☒ YES NO

3. Does the transporter delivering hazardous waste to another transporter or the designated facility:

a. Obtain a signed and dated (S/D) copy of the manifest? ☒ YES NO

b. Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date?

c. Give remaining copies of the manifest to accepting transporter or designated facility?

UNKNOWN; COPY NOT AT REU/DOE
YES NO BUT MAY BE IN ANCHOR-AGE

☒ YES NO

4. Does transporter deliver the entire quantity of HW accepted to:
- a. The designated facility listed on the manifest? or ☒ YES NO
 - b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO
 - c. The next designated transporter? YES NO
5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO
- F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? ☒ YES NO
- 1. Give notice to generator ☒ YES NO
 - 2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15?
 - 3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. ☒ YES NO
 - 4. Comments ☒ YES NO

**Alaska Department of Environmental Conservation
RCRA Hazardous Waste Management Compliance Evaluation Inspection Report**

Facility Name: Atwood, Inc. / Northern Oilfield Services

Identification Number: AKD 980976799 / AKD 023254378

<u>Mailing Address:</u> Deadhorse: Pouch 340043	Anchorage: P.O. Box 4-584
Prudhoe Bay, AK	Anchorage, AK
99734	99509

Facility Location: Tracts 2 and 3, Deadhorse Surface-Use Lease Tract Area,
Prudhoe Bay, Alaska

Telephone Number: Deadhorse: (907) 659-2876 Anchorage: (907) 562-2168

Date of Inspection: September 11, 1986

Inspector's Name/Title: Jeff Mach, Environmental Field Officer
Alaska Department of Environmental Conservation
Northern Regional Office
Pouch 1601
Fairbanks, Alaska 99707-1601
Telephone: (907) 452-1714

Background and Compliance History:

Atwood Inc. operates Dalton Camp, a hotel, office, and shop complex located in the Deadhorse area of Prudhoe Bay. This complex is occupied by employees of Atwood Inc. and affiliated companies, such as Northern Oilfield Services, and other nonaffiliated oilfield service companies that lease residence, office, and work space. Northern Oilfield Services provides a variety of miscellaneous services, such as earthwork and snow road construction, welding, and vacuum truck services to North Slope, oil industry-related businesses.

Because of the similarities in their hazardous waste activity notification forms and the fact that the companies share the same facility, the inspections were conducted as one and this report serves for both. The company was advised that they could probably vacate one of the identification numbers and simplify the situation.

There is no previous hazardous waste compliance history with either of these companies at this facility or elsewhere.

Introduction and Record Review:

Atwood Inc. and Northern Oilfield Services notified EPA of hazardous waste generation and transportation activity at the same time, in December 1984, with virtually identical forms. The companies both identified the handling of listed spent halogenated and nonhalogenated solvents (F001, F002, F003, F004, and F005), listed petroleum refining wastes (K048, K049, K050, K051, and K052), and ignitable (D001), corrosive (D002), reactive (D003), and EP toxic (D004 - D017) characteristic hazardous wastes.

Beyond the EPA hazardous waste activity notification forms, the only hazardous waste records in the DEC files on these companies consisted of one manifest that showed Northern Oilfield Services serving as the transporter for a shipment of waste oil from Conoco - Milne Point Unit to the ARCO Prudhoe Bay Unit injection facility in August 1985.

Facility Inspection:

Jeff Mach began the inspection at 9:00 am, with an interview of Mr. John Anchor, Camp Manager. Mr. Anchor advised that he served as a representative of both companies, because they are commonly owned and closely associated. The hazardous waste activities of both companies were reviewed and a tour of the facility was made.

Mr. Anchor reported that the facility generates the following potential hazardous wastes: used lubricating oil and solvent from vehicle and equipment maintenance and paint or lacquer thinners from periodic painting operations. Stoddard solvent is used in the facility's shop for equipment maintenance work. Used solvent from a parts cleaning dip tank of approximately 30 gallons in size is generated periodically, with the frequency depending on the level of work. The used oil, solvent, and paint and lacquer thinners are mixed and burned as used oil fuel in a Kroll 380,000 Btu/hr space heater, located in the shop building.

A tour of the Dalton Camp facility with Mr. Anchor revealed no accumulations of materials in containers, tanks, or elsewhere that may have been hazardous wastes.

A copy of the one known hazardous waste manifest where Northern Oilfield Services served as a transporter for a shipment of hazardous waste was not on file at the Prudhoe Bay facility. Mr. Anchor appeared to be unfamiliar with the manifest recordkeeping requirements in §263, but thought that any manifests would be kept on file in the Atwood/Northern Oilfield Services headquarters office in Anchorage. Otherwise, based on the one manifest, the company appeared to comply with the manifest requirements.

Sample Collection:

No samples were collected.

Conclusions:

No violations of the Generator or the Transporter Standards were discovered during this inspection. As with other facilities, the Atwood / Northern Oilfield Services' Dalton Camp needs to become better acquainted with the RCRA hazardous waste management requirements, since the facility generates some hazardous wastes and has served as a hazardous waste transporter.

Based on Jeff Mach's discussion with Mr. Anchor, along with observations of waste generation activities, the Dalton Camp facility appears to be a conditionally exempt small quantity generator of hazardous waste. The hazardous wastes generated by the facility appear to be spent, nonlisted solvent and paint and lacquer thinners, both of which are regulated as ignitable hazardous wastes. The disposal of these hazardous wastes at the facility by blending and burning them with used oil for energy recovery appears to be in compliance with the requirements of §266, Subpart E.

Northern Oilfield Services' failure to have a copy of the one known hazardous waste manifest on file at Dalton Camp is not necessarily a violation of §263.22(a), since the transporters' requirement does not preclude such recordkeeping in Anchorage. Whether a copy of the manifest was on file in the Anchorage office, could not be confirmed during this inspection. A 3007 letter requesting a copy of this manifest or a visit to the Anchorage office to review their records could confirm their compliance with the transporter recordkeeping requirements.

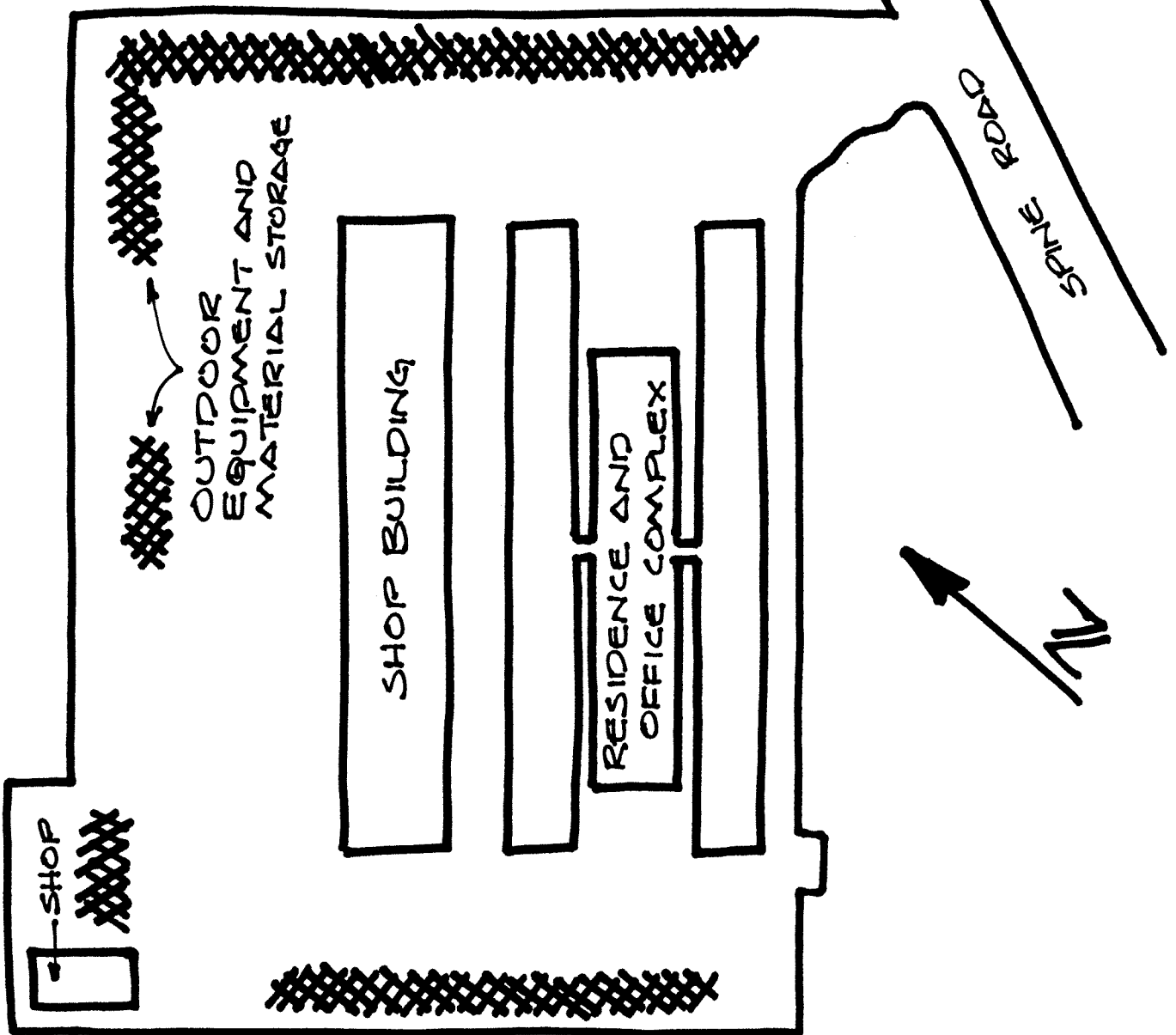
Appendices:

1. Facility Diagram
2. Copy of Manifest
3. RCRA Inspection Checklist

Closing Discussion With Facility:

Jeff Mach held a closing discussion with Mr. Anchor. Since both Atwood Inc. and Northern Oilfield Services operate out of the same facility, Mach recommended that they consider requesting EPA to rescind one of the identification numbers, such as the Atwood Inc. number, and operate solely as Northern Oilfield Services. Mr. Anchor was advised that the facility needed to monitor its generation of potential hazardous wastes, by watching product purchases, changes in operations, and by conducting some waste analyses. Mr. Anchor was also advised to watch for changes in the regulation of used oil in the future. In relation to the transportation of hazardous wastes by Northern Oilfield Services, Mr. Anchor was advised to review the recordkeeping requirements in §263 and ensure that the company

complied with them.



NOT TO SCALE

ATWOOD INC / NORTHERN
OILFIELD SERVICES
"DALTON CAMP"
TRACTS 2 AND 3, DEADHORSE

UNIFORM HAZARDOUS
WASTE MANIFEST

AKD980977680 0045

Document of 1 is not required by Federal law.

3. Generator's Name and Mailing Address
APP 91988
CONOCO INC
POUCH 340045
PRUDHOE BAY, AK, 99734

A. State Manifest Document Number
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone

5. Transporter 1 Company Name
NORTHERN OILFIELD SERVICES
6. US EPA ID Number
AKD023254378

7. Transporter 2 Company Name
8. US EPA ID Number
9. Designated Facility Name and Site Address
ARCO Injection Facility
PRUDHOE BAY, AK.
10. US EPA ID Number
AKD991281221

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
	No.	Type			
a. WASTE OIL - FLAMMABLE LIQUID - ID: UN1270	1	T.T.	1596	G	
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
NONE

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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Signature
Garrel Rowell
Date
8/1/85

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
MIKE SEVERANCE
Signature
Mike Severance
Date
8/1/85

18. Transporter 2 Acknowledgement or Receipt of Materials
Printed/Typed Name
Signature
Date

19. Discrepancy Indication Space
Received 39 BBL's

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed Typed Name
C. J. MITCHELL
Signature
C. J. Mitchell
Date
10/5/85

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised March 8, 1983)

- A. Inspection: Type of Inspection: Evaluation (✓); Sampling ();
Record Review (); Special (); Follow-up;
Date/Time Inspection commenced: SEPTEMBER 11, 1986 9 AM.
- B. Facility
EPA/State ID AKD 980976799 / AKD 023254378
Name & Addresses ATWOOD INC. / NORTHERN OILFIELD SERVICES
1. Mailing: PO BOX 4-584 ANCHORAGE, AK. 99509
2. Location: PO BOX 340043
TRACTS 2 & 3
FRUDHOE BAY, AK. 99734
Contact: MR. LARRY PETERSON, SENIOR V.P.
Telephone: (907) 562-2168

<u>C. Compliance Summary</u>	<u>IN</u>	<u>OUT</u>	<u>N/A</u>
RCRA (Statute)	()	()	(✓)
40 CFR 270	()	()	(✓)
40 CFR 124	()	()	(✓)
40 CFR 261.5	(✓)	()	()
40 CFR 262	()	()	(✓)
40 CFR 263	(✓)	()	()
40 CFR 264 (Permit)	()	()	(✓)
40 CFR 265	()	()	(✓)

Specific Violations: _____

D. Inspector

Name (Print) JEFF MACH Title: ENVIRONMENTAL
Signature JEFF MACH FIELD OFFICER
Organization AK. DEPT. OF ENVIRONMENTAL CONSERVATION
Phone (907) 452-1714

E. Inspection Participants:

Name	Title	Phone #
<u>MR. JOHN ANCHOR</u>	<u>CAMP MGR.</u>	<u>(907) 659-2867</u>

F. Notification/Permit Information

1. Started operation: CA. 1978 Date: _____
2. Notification filed: ☒ YES ☐ NO Date: 12/84
3. Part A application filed: YES ☒ NO Date: _____
4. Part B called/Date Due YES ☒ NO Date: _____
5. Part B application: YES ☒ NO Date: _____
6. Changes in Notification or Part A: _____

7. Facility's classified as:

Generator	<input checked="" type="checkbox"/>
Transporter	<input checked="" type="checkbox"/>
Treatment facility	<input type="checkbox"/>
Storage facility	<input type="checkbox"/>
Disposal facility	<input type="checkbox"/>
Small quantity generator	<input type="checkbox"/>
Recycler	<input type="checkbox"/>
Less than 90 day storage	<input type="checkbox"/>
Wastewater treatment unit exemption (WWTU)	<input type="checkbox"/>
Elementary neutralization unit exemption (ENU)	<input type="checkbox"/>

8. Does facility have a Part A withdrawal request in ?
YES ☒ NO

Status _____

Comments: BOTH COMPANIES NOTIFIED OF GENERATION
AND TRANSPORTATION ACTIVITIES ; BOTH
OPERATE FROM SAME FACILITY.

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

- (1) Ignitability D001 (SMALL QUANTITIES OF STANDARD SOLVENT, PAINT THINNERS)
- (2) Corrosivity D002 (NOTIFIED - NO APPARENT GENERATION)
- (3) Reactivity D003 (NOTIFIED - NO APPARENT GENERATION)
- (4) EP Toxicity (NOTIFIED - NO APPARENT GENERATION)

b. Listed HW?

- (1) HW from non-specific sources (FXXX)
F001 - F005 (NOTIFIED - NO APPARENT GENERATION)
- (2) HW from specific sources (KXXX)
K048 - K052 (NOTIFIED - NO APPARENT GENERATION)

c. Discarded commercial chemical product (PXXX or UXXX)

- (1) PXXX _____
- (2) UXXX _____

d. Has facility petitioned to delist waste? YES ☒ NO

Date: _____ Comments: _____

e. Does facility qualify for WWTU or ENU? YES ☒ NO

Comments: _____

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? SEE REPORT

- (1) What are the wastes generated? _____
- (2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? KNOWLEDGE OF PRODUCTS USED

Comments: _____

(3) Are records available on the determination(s)? YES ☒ NO

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES

NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

SEE REPORT.

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste:
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised March 8, 1984)

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]? YES ☒ NO

a. If yes, is the waste stored in containers or tanks?

- b. Is any HW stored in waste piles or surface impoundments? YES ☒ NO

B. Small Quantity Generator (SQG) Regulations

1. Has generator determined if he generates a hazardous waste (262.11). ☒ YES NO

2. Which of the following describes the SQG's treatment and/or disposal of his HW?

- a. occurs on-site ☒ YES NO
MIXED WITH USED OIL AND BURNED FOR ENERGY RECOVERY
- b. ensure delivery to an off-site facility, either of which is:

(1) permitted under Part 270 YES ☒ NO

(2) in interim status under Part 270 and 265 YES ☒ NO

(3) authorized to manage HW by an authorized state YES ☒ NO

(4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES ☒ NO

(5) (a) facility which

(a) beneficially uses, re-uses recycles or reclaims his HW YES ☒ NO

(b) treats his waste prior to use, re-use, recycle, or reclamation YES ☒ NO

3. Does generator manifest his wastes (not required)? YES ☒ NO

III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)

N/A

- A. Is the facility or does facility claim to be a small quantity generator?

YES NO

Comments: APPEARS TO BE CONDITIONALLY EXEMPT
AT THIS TIME

- B. Does generator transport its own waste?

YES NO

1. If NO, what is contractor's EPA ID, name, address, and phone?
2. If YES, see Transporter Regulations (Section III).

- C. Does generator use the manifest system?

YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES NO

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.
3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

- | | |
|---|--------|
| a. Manifest document number | YES NO |
| b. Generator's name, mailing address, phone number, and EPA ID number | YES NO |
| c. Name and ID number of each transporter | YES NO |
| d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any. | YES NO |
| e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. | YES NO |

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

A. Transporter facility description.

1. Operates as a Transfer Facility YES ☒ NO
2. Operates as a Storage Facility YES ☒ NO
3. Operates as a Generator ☒ YES NO
4. Imports Wastes YES ☒ NO
5. Combines Manifested Shipments YES ☒ NO

B. Does transporter have an EPA ID? ☒ YES NO

C. Does the transporter comply with generator regulations under Part 262 if he imports hazardous waste or combines wastes of different DOT shipping descriptions into a single container? YES NO ☒ N/A

D. Does the transporter comply with storage regulations under Parts 270, 264, and 265 if he stores manifested shipments at a transfer facility for more than 10 days? YES NO ☒ N/A

E. Is transporter aware of and complying with manifest requirements under RCRA 263.20?

1. Before transporting HW is manifest dated and signed by generator? ☒ YES NO

2. Does the transporter sign, date, and return a copy of the manifest to the generator before transporting waste off the generator's property? ☒ YES NO

3. Does the transporter delivering hazardous waste to another transporter or the designated facility:

a. Obtain a signed and dated (S/D) copy of the manifest? ☒ YES NO

b. Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date?

UNKNOWN; COPY
NOT AT PREVIOUS
YES NO BUT MAY
BE IN
ANCHOR-
AGE

c. Give remaining copies of the manifest to accepting transporter or designated facility? ☒ YES NO

4. Does transporter deliver the entire quantity of HW accepted to:
- a. The designated facility listed on the manifest? or ☒ YES NO
 - b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO
 - c. The next designated transporter? YES NO
5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO
- F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? ☒ YES NO
- 1. Give notice to generator ☒ YES NO
 - 2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15?
 - 3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. ☒ YES NO
 - 4. Comments ☒ YES NO

MEMORANDUM

State of Alaska

TO: David DiTraglia
Manager
Hazardous Waste Program

FROM: Glenn Miller *gm*
Environmental Engineer III

DATE: July 29, 1987

FILE NO: C8A

TELEPHONE NO: 465-2666

SUBJECT: RCRA Compliance
Training Exercise
Northern Oilfield Services/
Atwood, Inc.

On September 11, 1986, field officer Jeff Mach inspected Northern Oilfield Services/Atwood, Inc. for compliance with RCRA. The inspection report is enclosed. The only potential violation noted was a failure to keep a copy of a manifest for the required three-year period. On June 18, 1987 I called the Anchorage office of the firm and offered them an opportunity to prove that they had saved a copy of the manifest in the Anchorage office. I found that Atwood and Northern Oilfield Services had been acquired by the Veco Construction Company. No manifest copy was found at the office. The proper response to the violation would be a notice of violation, however, since the companies have changed hands, I recommend no enforcement action.

GM1/clb
Attachment - Inspection report

NORTHERN OIL FIELD
SERVICES

AKD023254387

1986 CEI



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

August 12, 1987

RECEIVED
AUG 21 1987

REPLY TO
ATTN OF:

A00/J

MEMORANDUM

SUBJECT: RCRA Inspection

WASTE MANAGEMENT BRANCH

FROM: Irene Alexakos *Irene Alexakos*
Alaska Operations Office

TO: Chuck Rice, Chief
RCRA Compliance Section

THRU: Steven A. Torok *ST*
Air/Waste Team Leader

① ~~Martina R pe entry~~
② ~~Bill A - FYI 8/25/87~~
③ File

Attached is an inspection report submitted by ADEC for the following facility:

Atwood, Inc.

Northern Oilfield Services

AKD980976700

AKD023254378

Jeff Mach of ADECs Northern Regional office conducted this inspection on September 11, 1986. Atwood operates a hotel, office, and shop complex in Prudhoe Bay. Northern, an oil-service company, has space in the same complex and is owned by the same corporation as Atwood. Though the two companies submitted separate notifications to EPA in December, 1984, they are virtually the same. The inspections were, therefore, conducted as one. Mach recommended that they rescind one of these numbers and operate solely under the other.

The hazardous waste generated by the facility appears to be spent, nonlisted solvent, paint, and lacquer thinners. The disposal of these by blending and burning them with used oil for energy recovery appears to be in compliance with Section 266.

DEC knew of one instance where Northern served as the transporter for a shipment of waste oil (from Conoco to the ARCO injection well). That manifest was not available at the time of the inspection nor found subsequent to it when DEC phoned the company's Anchorage office. At that time, it was discovered that Atwood/Northern had been acquired by VECO.

The report is well written and comprehensive. It follows our standard format and includes a facility diagram, copy of manifest in question, inspection checklist, and enforcement consideration memo.

The proper response to the manifest violation would be a Notice of Violation; however, since the companies have changed hands, we recommend no enforcement action.

Attachment

cc: David DiTraglia, ADEC

STATE OF ALASKA

STEVE COWPER, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF ENVIRONMENTAL QUALITY
P.O. BOX 0, JUNEAU, ALASKA 99811-1800

Telephone:
(907)465-2666

July 31, 1987

RECEIVED
AUG 4 1987

AOO-JUNEAU


Mr. Steve Torok
U.S. EPA
Alaska Operations Office
3200 Hospital Drive
Juneau, AK 99801

Dear Mr. Torok:

Attached with this letter is the RCRA compliance inspection for Northern Oilfield Services and Atwood Inc.

Please contact me or Glenn Miller at 465-2666 if you have any questions about the inspection.

Sincerely,


David DiTraglia, Manager
Hazardous Waste Program

DDT/GM1/clb

Enclosure: Inspection Report
Checklist
Enforcement Considerations

cc: File C8A
Jeff Mach

MEMORANDUM


State of Alaska

TO: David DiTraglia
Manager
Hazardous Waste Program

DATE: July 29, 1987

FILE NO: C8A

TELEPHONE NO: 465-2666

FROM: Glenn Miller 
Environmental Engineer III

SUBJECT: RCRA Compliance
Training Exercise
Northern Oilfield Services/
Atwood, Inc.

On September 11, 1986, field officer Jeff Mach inspected Northern Oilfield Services/Atwood, Inc. for compliance with RCRA. The inspection report is enclosed. The only potential violation noted was a failure to keep a copy of a manifest for the required three-year period. On June 18, 1987 I called the Anchorage office of the firm and offered them an opportunity to prove that they had saved a copy of the manifest in the Anchorage office. I found that Atwood and Northern Oilfield Services had been acquired by the Veco Construction Company. No manifest copy was found at the office. The proper response to the violation would be a notice of violation, however, since the companies have changed hands, I recommend no enforcement action.

GM1/clb
Attachment - Inspection report

**Alaska Department of Environmental Conservation
RCRA Hazardous Waste Management Compliance Evaluation Inspection Report**

Facility Name: Atwood, Inc. / Northern Oilfield Services

Identification Number: AKD 980976799 / AKD 023254378

<u>Mailing Address:</u> Deadhorse: Pouch 340043	Anchorage: P.O. Box 4-584
Prudhoe Bay, AK	Anchorage, AK
99734	99509

Facility Location: Tracts 2 and 3, Deadhorse Surface-Use Lease Tract Area,
Prudhoe Bay, Alaska

Telephone Number: Deadhorse: (907) 659-2876 Anchorage: (907) 562-2168

Date of Inspection: September 11, 1986

Inspector's Name/Title: Jeff Mach, Environmental Field Officer
Alaska Department of Environmental Conservation
Northern Regional Office
Pouch 1601
Fairbanks, Alaska 99707-1601
Telephone: (907) 452-1714

Background and Compliance History:

Atwood Inc. operates Dalton Camp, a hotel, office, and shop complex located in the Deadhorse area of Prudhoe Bay. This complex is occupied by employees of Atwood Inc. and affiliated companies, such as Northern Oilfield Services, and other nonaffiliated oilfield service companies that lease residence, office, and work space. Northern Oilfield Services provides a variety of miscellaneous services, such as earthwork and snow road construction, welding, and vacuum truck services to North Slope, oil industry-related businesses.

Because of the similarities in their hazardous waste activity notification forms and the fact that the companies share the same facility, the inspections were conducted as one and this report serves for both. The company was advised that they could probably vacate one of the identification numbers and simplify the situation.

There is no previous hazardous waste compliance history with either of these companies at this facility or elsewhere.

Introduction and Record Review:

Atwood Inc. and Northern Oilfield Services notified EPA of hazardous waste generation and transportation activity at the same time, in December 1984, with virtually identical forms. The companies both identified the handling of listed spent halogenated and nonhalogenated solvents (F001, F002, F003, F004, and F005), listed petroleum refining wastes (K048, K049, K050, K051, and K052), and ignitable (D001), corrosive (D002), reactive (D003), and EP toxic (D004 - D017) characteristic hazardous wastes.

Beyond the EPA hazardous waste activity notification forms, the only hazardous waste records in the DEC files on these companies consisted of one manifest that showed Northern Oilfield Services serving as the transporter for a shipment of waste oil from Conoco - Milne Point Unit to the ARCO Prudhoe Bay Unit injection facility in August 1985.

Facility Inspection:

Jeff Mach began the inspection at 9:00 am, with an interview of Mr. John Anchor, Camp Manager. Mr. Anchor advised that he served as a representative of both companies, because they are commonly owned and closely associated. The hazardous waste activities of both companies were reviewed and a tour of the facility was made.

Mr. Anchor reported that the facility generates the following potential hazardous wastes: used lubricating oil and solvent from vehicle and equipment maintenance and paint or lacquer thinners from periodic painting operations. Stoddard solvent is used in the facility's shop for equipment maintenance work. Used solvent from a parts cleaning dip tank of approximately 30 gallons in size is generated periodically, with the frequency depending on the level of work. The used oil, solvent, and paint and lacquer thinners are mixed and burned as used oil fuel in a Kroll 380,000 Btu/hr space heater, located in the shop building.

A tour of the Dalton Camp facility with Mr. Anchor revealed no accumulations of materials in containers, tanks, or elsewhere that may have been hazardous wastes.

A copy of the one known hazardous waste manifest where Northern Oilfield Services served as a transporter for a shipment of hazardous waste was not on file at the Prudhoe Bay facility. Mr. Anchor appeared to be unfamiliar with the manifest recordkeeping requirements in §263, but thought that any manifests would be kept on file in the Atwood/Northern Oilfield Services headquarters office in Anchorage. Otherwise, based on the one manifest, the company appeared to comply with the manifest requirements.

Sample Collection:

No samples were collected.

Conclusions:

No violations of the Generator or the Transporter Standards were discovered during this inspection. As with other facilities, the Atwood / Northern Oilfield Services' Dalton Camp needs to become better acquainted with the RCRA hazardous waste management requirements, since the facility generates some hazardous wastes and has served as a hazardous waste transporter.

Based on Jeff Mach's discussion with Mr. Anchor, along with observations of waste generation activities, the Dalton Camp facility appears to be a conditionally exempt small quantity generator of hazardous waste. The hazardous wastes generated by the facility appear to be spent, nonlisted solvent and paint and lacquer thinners, both of which are regulated as ignitable hazardous wastes. The disposal of these hazardous wastes at the facility by blending and burning them with used oil for energy recovery appears to be in compliance with the requirements of §266, Subpart E.

Northern Oilfield Services' failure to have a copy of the one known hazardous waste manifest on file at Dalton Camp is not necessarily a violation of §263.22(a), since the transporters' requirement does not preclude such recordkeeping in Anchorage. Whether a copy of the manifest was on file in the Anchorage office, could not be confirmed during this inspection. A 3007 letter requesting a copy of this manifest or a visit to the Anchorage office to review their records could confirm their compliance with the transporter recordkeeping requirements.

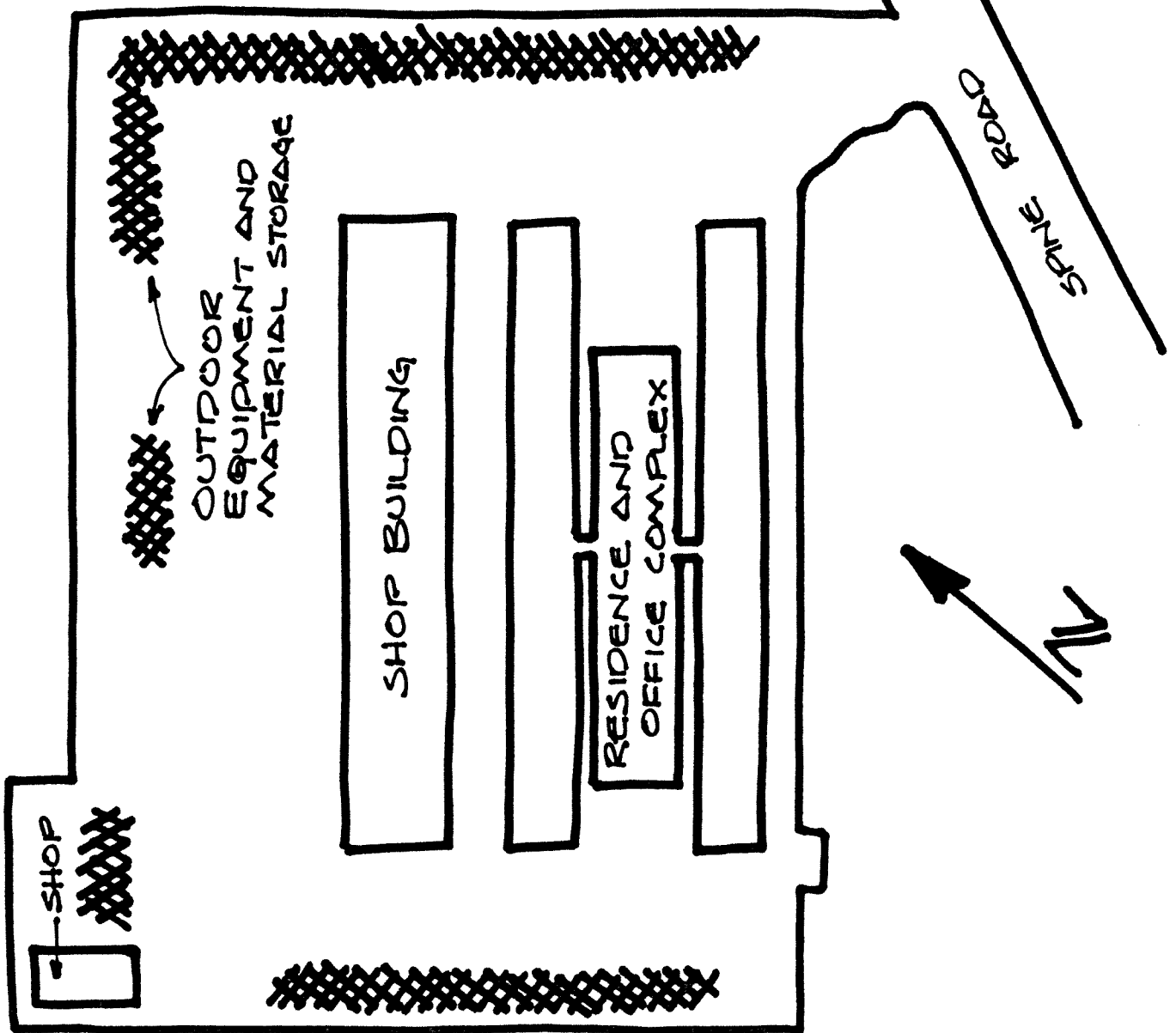
Appendices:

1. Facility Diagram
2. Copy of Manifest
3. RCRA Inspection Checklist

Closing Discussion With Facility:

Jeff Mach held a closing discussion with Mr. Anchor. Since both Atwood Inc. and Northern Oilfield Services operate out of the same facility, Mach recommended that they consider requesting EPA to rescind one of the identification numbers, such as the Atwood Inc. number, and operate solely as Northern Oilfield Services. Mr. Anchor was advised that the facility needed to monitor its generation of potential hazardous wastes, by watching product purchases, changes in operations, and by conducting some waste analyses. Mr. Anchor was also advised to watch for changes in the regulation of used oil in the future. In relation to the transportation of hazardous wastes by Northern Oilfield Services, Mr. Anchor was advised to review the recordkeeping requirements in §263 and ensure that the company

complied with them.



NOT TO SCALE

ATWOOD INC / NORTHERN
OILFIELD SERVICES
"DALTON CAMP"
TRACTS 2 AND 3, DEADHORSE

UNIFORM HAZARDOUS
WASTE MANIFEST

A.K.D. 9.80.97.7.6.8.0

Document

of

Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

APP 9 1988

CONSCO INC

POUCH 340045

Prudhoe Bay, AK, 99734

A. State Manifest Document Number

B. State Generator's ID

4. Generator's Phone (907)

1 659-2763

5. Transporter 1 Company Name

6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

ARCO Injection Facility

Prudhoe Bay, AK.

A.K.D. 9.9.1.2.8.1.2.2.1

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type13. Total
Quantity14. Unit
Wt./Vol

1. Waste No.

a. WASTE OIL - FLAMMABLE LIQUID - ID: UN1270

1 T.T

1596

~~1596~~ 6

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

NONE

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Date

Printed/Typed Name

GARREL ROWELL

Signature

Garrel Rowell

Month Day Year

8/1/85

17. Transporter 1 Acknowledgement of Receipt of Materials

Date

Printed/Typed Name

MIKE SEVERANCE

Signature

Mike Severance

Month Day Year

8/1/85

18. Transporter 2 Acknowledgement of Receipt of Materials

Date

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

Received 39 BBL's

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Date

Printed/Typed Name

C. J. MITCHELL

Month Day Year

10/5/85

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised March 8, 1983)

A. Inspection: Type of Inspection: Evaluation (☒); Sampling ();
Record Review (); Special (); Follow-up;
Date/Time Inspection commenced: SEPTEMBER 11, 1986 9 AM.

B. Facility
EPA/State ID AKD 980976799 / AKD 023254378
Name & Addresses STWOOD INC. / NORTHERN OILFIELD SERVICES
1. Mailing: P.O. BOX 4-584 ANCHORAGE, AK. 99509
2. Location: P.O. BOX 340043
TRACTS 2 & 3
PRUDHOE BAY, AK. 99734
Contact: MR. LARRY PETERSON, SENIOR V.P.
Telephone: (907) 562-2168

<u>C. Compliance Summary</u>	<u>IN</u>	<u>OUT</u>	<u>N/A</u>
RCRA (Statute)	()	()	()
40 CFR 270	()	()	()
40 CFR 124	()	()	()
40 CFR 261.5	()	()	()
40 CFR 262	()	()	()
40 CFR 263	()	()	()
40 CFR 264 (Permit)	()	()	()
40 CFR 265	()	()	()

Specific Violations: _____

D. Inspector

Name (Print) JEFF MACH Title: ENVIRONMENTAL
Signature [Signature] FIELD OFFICER
Organization AK. DEPT. OF ENVIRONMENTAL CONSERVATION
Phone (907) 452-1714

E. Inspection Participants:

Name	Title	Phone #
<u>MR. JOHN ANCHOR</u>	<u>CAMP MGR.</u>	<u>(907) 659-2867</u>

F. Notification/Permit Information

1. Started operation: CA. 1978 Date:
2. Notification filed: ☒ YES ☐ NO Date: 12/84
3. Part A application filed: YES ☒ NO Date:
4. Part B called/Date Due YES ☒ NO Date:
5. Part B application: YES ☒ NO Date:
6. Changes in Notification or Part A:

7. Facility's classified as:

Generator	<input checked="" type="radio"/>
Transporter	<input checked="" type="radio"/>
Treatment facility	<input type="radio"/>
Storage facility	<input type="radio"/>
Disposal facility	<input type="radio"/>
Small quantity generator	<input type="radio"/>
Recycler	<input type="radio"/>
Less than 90 day storage	<input type="radio"/>
Wastewater treatment unit exemption (WWTU)	<input type="radio"/>
Elementary neutralization unit exemption (ENU)	<input type="radio"/>

8. Does facility have a Part A withdrawal request in ?
YES ☒ NO

Status

Comments: BOTH COMPANIES NOTIFIED OF GENERATION
AND TRANSPORTATION ACTIVITIES; BOTH
OPERATE FROM SAME FACILITY.

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

- (1) Ignitability D001 (SMALL QUANTITIES OF SOLVENT, PAINT THINNERS)
- (2) Corrosivity D002 (NOTIFIED - NO APPARENT GENERATION)
- (3) Reactivity D003 (NOTIFIED - NO APPARENT GENERATION)
- (4) EP Toxicity (NOTIFIED - NO APPARENT GENERATION)

b. Listed HW?

- (1) HW from non-specific sources (FXXX)
F001 - F005 (NOTIFIED - NO APPARENT GENERATION)
- (2) HW from specific sources (KXXX)
K048 - K052 (NOTIFIED - NO APPARENT GENERATION)

c. Discarded commercial chemical product (PXXX or UXXX)

- (1) PXXX _____
- (2) UXXX _____

d. Has facility petitioned to delist waste? YES ☒ NO

Date: _____ Comments: _____

e. Does facility qualify for WWTU or ENU? YES ☒ NO

Comments: _____

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? SEE REPORT

- (1) What are the wastes generated? _____
- (2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? KNOWLEDGE OF PRODUCTS USED

Comments: _____

(3) Are records available on the determination(s)? YES ☒ NO

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES

NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

SEE REPORT.

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste:
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised March 8, 1984)

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]?
YES ☒ NO
- a. If yes, is the waste stored in containers or tanks?
- b. Is any HW stored in waste piles or surface impoundments?
YES ☒ NO

B. Small Quantity Generator (SQG) Regulations

1. Has generator determined if he generates a hazardous waste (262.11).
YES ☒ NO
2. Which of the following describes the SQG's treatment and/or disposal of his HW?
 - a. occurs on-site ☒ YES ☒ NO
MIXED WITH USED OIL AND BURNED FOR ENERGY RECOVERY
 - b. ensure delivery to an off-site facility, either of which is:
 - (1) permitted under Part 270
YES ☒ NO
 - (2) in interim status under Part 270 and 265
YES ☒ NO
 - (3) authorized to manage HW by an authorized state
YES ☒ NO
 - (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or
YES ☒ NO
 - (5) (a) facility which
 - (a) beneficially uses, re-uses recycles or reclaims his HW
YES ☒ NO
 - (b) treats his waste prior to use, re-use, recycle, or reclamation
YES ☒ NO
3. Does generator manifest his wastes (not required)?
YES ☒ NO

III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)

N/A

- A. Is the facility or does facility claim to be a small quantity generator?

YES NO

Comments: APPEARS TO BE CONDITIONALLY EXEMPT AT THIS TIME

- B. Does generator transport its own waste?

YES NO

1. If NO, what is contractor's EPA ID, name, address, and phone?

2. If YES, see Transporter Regulations (Section III).

- C. Does generator use the manifest system?

YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES NO

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

- | | |
|---|--------|
| a. Manifest document number | YES NO |
| b. Generator's name, mailing address, phone number, and EPA ID number | YES NO |
| c. Name and ID number of each transporter | YES NO |
| d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any. | YES NO |
| e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. | YES NO |

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

A. Transporter facility description.

1. Operates as a Transfer Facility YES ☒ NO
2. Operates as a Storage Facility YES ☒ NO
3. Operates as a Generator ☒ YES NO
4. Imports Wastes YES ☒ NO
5. Combines Manifested Shipments YES ☒ NO

B. Does transporter have an EPA ID? ☒ YES NO

C. Does the transporter comply with generator regulations under Part 262 if he imports hazardous waste or combines wastes of different DOT shipping descriptions into a single container? YES NO ☒ N/A

D. Does the transporter comply with storage regulations under Parts 270, 264, and 265 if he stores manifested shipments at a transfer facility for more than 10 days? YES NO ☒ N/A

E. Is transporter aware of and complying with manifest requirements under RCRA 263.20?

1. Before transporting HW is manifest dated and signed by generator? ☒ YES NO

2. Does the transporter sign, date, and return a copy of the manifest to the generator before transporting waste off the generator's property? ☒ YES NO

3. Does the transporter delivering hazardous waste to another transporter or the designated facility:

a. Obtain a signed and dated (S/D) copy of the manifest? ☒ YES NO

b. Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date?

UNKNOWN; COPY NOT AT PREVIOUS YES NO BUT MAY BE IN ANCHOR-AGE

c. Give remaining copies of the manifest to accepting transporter or designated facility? ☒ YES NO

4. Does transporter deliver the entire quantity of HM accepted to:
- a. The designated facility listed on the manifest? or ☒ YES NO
 - b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO
 - c. The next designated transporter? YES NO
5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO
- F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? ☒ YES NO
- 1. Give notice to generator ☒ YES NO
 - 2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15?
 - 3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. ☒ YES NO
 - 4. Comments ☒ YES NO



NORTHERN OILFIELD SERVICES, INC.

BOX 4-584 ANCHORAGE, ALASKA 99509

(907) 562-2168

File
KDP
Wheat
gm

July 3, 1986

Mr. Kenneth D. Feigner, Chief
Waste Management Branch
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle WA 98101

Dear Mr. Feigner:

I am in receipt of your letter dated June 23, 1986 regarding a 1986 Biennial Report of Hazardous Waste Activity from your agency. As of this date I am not personally aware of having received any requests for information from your agency. We originally registered with the E.P.A. so that should circumstances arise that we would be involved in the generation, storage, disposal or treatment of hazardous waste, we would have the necessary authorizations to do so. I can also tell you that since we became registered with the E.P.A. we have not been involved in the generation, treatment, storage or disposal of any hazardous waste.

Should you need to have a report or a formal report form, please do not hesitate to forward one to my attention and we will be happy to comply with your request.

We have two organizations, Atwood, Inc. and Northern Oilfield Services, Inc., which have registered with your agency. The registration number for Atwood, Inc. is AKD980976799 and for Northern Oilfield Services, Inc. is AKD023254378.

Mr. Feigner, if I can be of further assistance to you in this matter, please do not hesitate to advise.

Regards,

Larry D. Pedersen
Senior Vice President
Northern Oilfield Services, Inc.

RECEIVED
JUL 10 1986

WASTE MANAGEMENT BRANCH

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT



U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

RECEIVED
DEC 10 1984

TECHNICAL OPERATIONS SECTION

FOR OFFICIAL USE ONLY

COMMENTS

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
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INSTALLATION'S EPA I.D. NUMBER												APPROVED		DATE RECEIVED (yr., mo., & day)			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
AKD023254378														8/12/18			

I. NAME OF INSTALLATION

Northern Oilfield Services Inc

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX																			
PO Box A-584																			
CITY OR TOWN															ST.		ZIP CODE		
Anchorage															AK		99509		

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER																			
Pouch 340043																			
CITY OR TOWN															ST.		ZIP CODE		
Prudhoe Bay															AK		99737		

NORTH SLOPE
185

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)															PHONE NO. (area code & no.)				
Pedersen Larry Sr. Vice Pres.															907-562-2168				

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER																			
Atwood, Burton III																			

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F - FEDERAL
M - NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- ☒ A. GENERATION ☒ B. TRANSPORTATION (complete item VII)
☐ C. TREAT/STORE/DISPOSE ☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

- ☐ A. AIR ☐ B. RAIL ☒ C. HIGHWAY ☐ D. WATER ☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. - FOR OFFICIAL USE ONLY												
W												
1	2	3	4	5	6	7	8	9	10	11	12	13

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001	2 F002	3 F003	4 F004	5 F005	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 K048	32 K049	33 K050	34 K051	35 K052	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

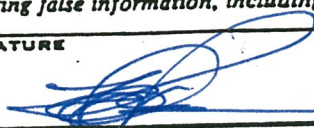
☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

Larry D. Pedersen
Senior Vice President

DATE SIGNED

12/14/84



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• AKD023254378

INSTALLATION ADDRESS

NORTHERN OILFIELD SERVICES INC
PO BOX 4-584
ANCHORAGE AK 99509

POUCH 340043
PRUDHOE BAY AK 99737